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11 Fiona Harvey

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

15 | FIONA HARVEY

16 Plaintiff,

V.

18 NETFLIX, INC. and NETFLIX
19 WORLDWIDE ENTERTAINMENT,
LLC,

Defendants.

Case No. 2:24-cv-04744-RGK-AJR

**DECLARATION OF JOHN
DINGWALL IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO
DEFENDANTS' SPECIAL MOTION
TO STRIKE**

Place: Roybal Federal Building and U.S.
Courthouse, 255 East Temple Street, Los
Angeles, CA 90012, Courtroom 850

Judge: The Hon. R. Gary Klausner

I, JOHN DINGWALL, hereby declare and state as follows:

1. I am a Senior Reporter at Scottish Daily Record newspaper. I submit this declaration based upon my personal knowledge and, if called as a witness, could and would testify to the matters set forth below.
2. This declaration is submitted in connection with Plaintiff Fiona Harvey's Opposition to Defendants Netflix Inc.'s, and Netflix Worldwide Entertainment LLC's Special Motion to Strike.
3. I have been a reporter for 41 years, where I have been writing articles for Scottish and British newspapers and magazines.
4. Having commenced my employment at the Scottish Daily Record in 1995, I have close to 30 years-experience as a music editor, features writer and news reporter at the Daily Record. I have prepared, written and edited thousands of exclusives, interviewing A-list celebrities, traveling the world and breaking hard-hitting news stories.
5. I watched *Baby Reindeer* when it was released in or around late April 2024.
6. In late April 2024, I decided to investigate the identity of the real life Martha. I Googled "real life Martha" and it referred me to the X social media platform where I found Fiona Harvey's tweet to Richard Gadd about 'hanging her curtains' in minutes. That is one of the phrases used in *Baby Reindeer*.
7. Also, prior thereto, I did not know who Fiona was. I had never heard of her. I knew nothing about her. Her name was certainly not known to the public to my knowledge. She was a completely unknown person who was thrust in the spotlight as a result of *Baby Reindeer*.

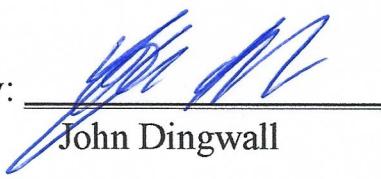
8. On May 3, 2024, after learning her identity, the Scottish Daily Record published an article that I wrote titled, *Real Baby Martha reveals identity and says 'I did not do jail time.'* As reported in my article, by the time my article was published, Harvey had already been publicly identified by other news sources.

9. Immediately after my article was published, I received intense feedback from people who questioned why I was giving a voice to Fiona Harvey, since she was a convicted criminal and who did the things shown in Baby Reindeer. People were taking *Baby Reindeer* as true story.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed this 19th of August, 2024 in Glasgow, Scotland, UK.

By: _____


John Dingwall